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Attorneys for: **Lakisha Kinlaw-Capri**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
(HON. M. JAMES LORENZ)

UNITED STATES OF AMERICA,)	Case No. 08CR0080-L
)	
Plaintiff,)	JOINT MOTION TO CONTINUE
)	SENTENCING HEARING; SUPPORTING
v.)	DECLARATION OF COUNSEL
)	
LAKISHA KINLAW-CAPRI ,)	Hearing Date: April 21, 2008
)	Hearing Time: 8:30 AM
Defendant.)	Courtroom: 14 (5th Flr-MJL)
)	
)	
)	

THE PARTIES JOINTLY MOVE THIS COURT for an order continuing the
sentencing hearing in the above-captioned case from April 21, 2008 at 8:30 AM to June 16, 2008
at 8:30 AM. The reasons for the continuance are set forth in the Declaration of Counsel attached
hereto.

Date: March 3, 2008. s/ William W. Brown
William W. Brown, BROWN & ASSOCIATES
Attorneys for Lakisha Kinlaw-Capri

Date: March 3, 2008 s/ David Leshner
ASSISTANT UNITED STATES ATTORNEY

**DECLARATION OF COUNSEL IN SUPPORT OF STIPULATION TO CONTINUE
SENTENCING HEARING**

I, William W. Brown, state:

1. I am an attorney at law duly licensed to practice before all of the courts in the State of California, the United States District Court for the Southern District of California, the United States Court of Appeals for the Ninth Circuit, and the United States Supreme Court. I am appointed under the Criminal Justice Act, 18 U.S.C. § 3006A, to represent Lakish Kinlaw-Capri.

2. Ms. Kinlaw-Capri was recently moved to CCA in Otay Mesa. This unexpected move occurred shortly after entering her guilty plea. It also occurred during the middle of coordinating an appointment for her PSR interview with USPO Tina M. Geissler. To properly prepare my client for the interview and to not impinge upon Ms. Geissler's fast approaching dictation date, I need additional time and the sentencing date reset.

3. My client is in custody. We have discussed the proposed continuance. There is no objection.

I DECLARE, UNDER PENALTY OF PERJURY, THAT THE FOREGOING IS TRUE
AND CORRECT.

Date: March 3, 2008.

s/ William W. Brown
WILLIAM W. BROWN

CERTIFICATE OF SERVICE

U.S.A. vs. Kinlaw-Capri 08CR0080-L

I, the undersigned, hereby certify that a copy of **JOINT MOTION TO CONTINUE SENTENCING HEARING** was:

☒ **Deposited with Court Clerk:** I, the undersigned, hereby certify that a copy of **the above-referenced document(s)** was deposited with the Clerk of the United States District Court for the Southern District of California for delivery to Assistant United States Attorney, **David Leshner**.

☐ **Personal Service of Copy to AUSA:** I, the undersigned, hereby certify that I personally delivered a true copy of the above-referenced document(s) to the receptionist of the Office of the United States Attorney for the Southern District of California for immediate delivery to Assistant United States Attorney, **David Leshner**.

☐ **Personal Service of Original to Chambers:** I, the undersigned, hereby certify that I personally delivered the original of the above-referenced document(s) to the Chambers of the Honorable **M. James Lorenz**.

☐ **Facsimile Service of Courtesy Copy to AUSA:** I, the undersigned, caused a facsimile transmission a true copy of the above-referenced document(s) from 619-234-3655 to **David Leshner** at the Office of the United States Attorney for the Southern District of California, facsimile machine telephone number **619-235-2757**.

☐ **Facsimile Service of Courtesy Copy to Chambers:** I, the undersigned, caused a facsimile transmission a true copy of the above-referenced document(s) from 619-234-3655 to the Chambers of the Honorable **M. James Lorenz**, facsimile machine telephone number .

☐ **Service by Mail [CivLR5.3]:** I, the undersigned, hereby certify that a true copy of the above-referenced document(s) was served upon all counsel of record by postage prepaid, first-class, United States Postal Service mail to there last known address at: SEE ATTACHED SERVICE LIST.

Executed on March 3, 2008, at San Diego, California.

s/ William W. Brown